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HH, 111  
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IN THE U.S. DISTRICT COURT for the  
District of DELAWARE

Kenneth R. Abraham  
(hereinafter KA)  
v.

07-593

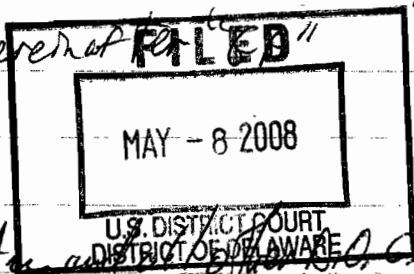
Petition for Declaratory  
Judgment and Injunctive  
relief.

Delaware Department of  
Corrections (hereinafter DOC),  
and Commissioner Carl Danberg, (CD)  
and Warden Perry Phelps, DCC (PP) and sought,  
and Ronnie Moore, Health Care Services  
Administrator, D.C.C.

Full evidentiary hearing sought,  
Appointment of Counsel necessary  
and sought,  
Expert Witness necessary and  
sought,

and "Master Counselor" D. Spence of ACC.  
in the "Greentree Treatment Program,  
hereinafter "FILED"

Attached and incorporated by this reference:



Copies of 240/CS 3502, 3501, 3507, 3520

In forma pauperis Affidavit

News Journal editorial of 3/6/08, Affidavit of 4/2/08

"Statement" of 11/12/07, Summary of Probation

"Letter to Danberg of 11/23/07" Exhibits 7S.

"FBI letter" of 11/7/07.

Inmates running G.P. hereinafter

referred to as IICs (Inmates in charge)

and ~~any other DOC staff~~ staff  
administering the GP at all D.O.C.  
facilities, whose names and titles  
sofar are unknown to KA.

Comes now KA, pro se, and states that all of the following  
is true and correct and will be proved at a hearing and ~~proves~~ <sup>Petition</sup>  
this Honorable Court as follows on this 12<sup>th</sup> day of April, 2008:

- 1) KA has been incarcerated by DOC since Jan. 3<sup>rd</sup> 2007.
- 2) KA has had two serious problems with cocaine addiction  
in his lifetime, one of which caused him to commit crime leading  
to incarceration.
3. On Jan 3, 2007, KA rejected an offer of probation and

requested to be incarcerated for treatment for addiction, knowing nothing about D.O.C. "Treatment" programs except for misleading and incorrect ~~information~~ information related by the public defender's office.

4. I was in the Civigenics "Crest Treatment Program" at DCC for approximately 4 months in 2007. This program, in its operation, is nearly as incompetent, ineffective and grossly mismanaged as the "Greentree program" but is not a subject of this pleading.

5. In 1990-91 KA had the benefit of a drug addiction treatment program in Orlando, Florida, for which he volunteered, which kept him clean and substance free for 16 years.

6. KA has, during the past 18 ± years, read and studied many (between 12 and 20) texts and treatises concerning alcohol, drug, and behavioral addictions, including: Understanding and Counseling Persons with Alcohol, Drug, and Behavioral Addictions, by Howard Clinchell, PhD The Recovery Book, author not remembered, The Alcoholics Anonymous and Narcotics Anonymous Basic 12 step texts, Diseasing of America: Addiction treatment out of Control, by Stanton Peele, The Facts About Drug Use, by Barry Stimmel MD, Addiction and Grace, by Gerald May MD., Alcoholism in the Professions, by Brossell and Haberman, Alcohol in America: The Price We Pay, by Rashi Fein, Clinical textbook of Addictive Disorders, by Francis and Miller, The Disease Concept of Alcoholism, by Jellinek, The Natural Mind: An Investigation of Drugs and the Higher Consciousness, by Andrew Weil.

7. The Greentree Program (hereinafter "GP"), is a so-called treatment program run by D.O.C. at OCC and other D.O.C. facilities.

8. On Sept 19, 2007, KA was sentenced to 5 years, suspended for completion of GP. See "Status sheet" attached.

9. The duration of GP is from 6 to 18 months. Some inmates are allowed to

10. On Sept 28, 2007, KA entered the GP on B tier of Victor Building at DCC. KA remained in the GP until 11/13/07, and was preparing to teach one of the courses, to begin the following week, at the request

stay for years



11. Approximately 150 inmates are in GP at any given time in Victor Bldg at D.C., in 4 tiers.
12. Hundreds of inmates pass through D.O.C. GP at its various facilities annually.
13. On November 12, 2007, KA was removed from GP by the outrageous unlawful and criminal actions of two D.O.C. guards, which will be the subject of other unrelated necessary litigation. See "Statement of 11/12/07" and "Letter to Danberg of 11/28/07" and "FBI letter of 11/7/07" all of which are attached hereto and incorporated by reference.
14. During his time in GP, KA attended more classes than required, was doing fine, and was asked to teach the class on Anger Management by the "Head Facilitator," one of the IICs.
15. During his time in GP, KA spoke with approximately 80 inmates in the GP, some of whom had been in it for more than 10 years, about how GP is operated.
16. In the administration of GP the professional staff of DCC has abdicated all responsibility and authority.
17. Inmates (hereinafter "IIC" for Inmates in Control) control, dictate and command all aspects of life on the tier, day and night. Inmates are in their tiers 80% of every day. All night.
18. Inmates "teach" all GP "classes" or "courses".
19. None of them is qualified or trained to do so.
20. No (zero, zip, nada, none) "classes" or "courses" of GP are taught by D.O.C. staff or any other trained or licensed professionals, i.e. psychiatrists or psychologists or even educated counselors.
21. The IIC actually determine who does or does not complete a class or course. Believe or not, this will be proved.

violates  
24 Del. C. § 2502  
2502

violates  
24 Del. C. § 2502  
2502

22. IIC actually determine which other inmates complete or "graduate" from the GP. D.O.C staff asks the IIC for the names of those who "pass" or "complete" as they themselves have no possible knowledge of the behavior, learning or progress of those in GP.
23. "Counselors" are in the building perhaps 3 or 4 hours per week, and that time is spent merely classifying or processing inmates into or out of GP. 3 or 4 hours maximum.
24. There is No real counseling, individual or group, None.
25. Most inmates in GP are Court Ordered as part of their sentence to "complete" GP. GP completion "Get out of jail free" card.
26. "Completion" of the GP in most cases results in the suspension of a period of incarceration or other consideration for early release from incarceration. Hence, men will tolerate the nonsense.
27. Like many other components of the so called "war on drugs," the GP is an abject, colossal failure.
28. No credible, reliable evidence exists to show that GP is in any way a "success." i.e. Comparisons of recidivism or recovery rates of those who completed "GP" to the rates of inmates who did not, or any other evidence. Only naked political pronouncements.
29. It is apparent to anyone with eyeballs that the inmate participants are merely "shuffled through the system."
30. GP does more harm than good. Expert witnesses will so testify.
31. Most inmates dare not complain about the obvious absurdities of GP for fear of being punished - thrown out of program, or denied "completion" by IIC or DOC staff. They pretend nonsense is sense.
32. D.O.C. Guards pass through the tier every 1/2 hours, at which time inmates must be in their cells, or in "formation." The guards otherwise are not present in the housing tiers and do not control

they must or face longer imprisonment.



33. It is the very gross inaction of D.O.C. personnel coupled with the actions of the I.C. of OP which KA seeks to have Declared unlawful and unconstitutional and halted or significantly modified (improved).

34. Many I.C. are violent, repeat offenders.

35. Many I.C. have obviously serious anti-social/behavioral problems and nearly all I.C. have anti-social beliefs and attitudes, i.e., they manifest no inclination toward or understanding of the truth or responsibility.

36. I.C. extort other inmates by compelling them to engage in certain behaviors, or extort food or other favors from inmates to "pass" them in a "class".

37. I.C. make up the rules on the tier, and enforce them.

38. All inmates in OP are required to obey the commands of I.C., no matter how preposterous, or they are punished by I.C. in a variety of ways - chores, exercises (physical), writing "essays", standing still in the hall for up to 1 hour, having to walk the hall way nearly all day or night ~~repeated~~ repeating a phrase ordered to be repeated by I.C., etc. Doing pushups, cleaning chores, etc.

39. I.C. routinely break their own rules.

40. I.C. punish other inmates regularly in arbitrary and capricious fashion. I.C.s also exhibit religious bias.

41. Some I.C. exhibit obvious racial bias in their treatment of inmates - issuing or withholding punishments.

42. Punishment is called "treatment".

43. None of the materials KA has read or experienced recommend the procedures employed by I.C. in OP. Not one. Not one qualified counselor or professional KA has met.

44. IIC dictate when inmates can or cannot (a) leave their cell, <sup>(b)</sup> sleep, (c) talk to each other, go to rec, etc.

45. IIC regularly disrupt sleep by calling all into the hallway for "Treatment." "Treatment" is the whim or will of the IIC - some physical exercise or muttering memorized phrases.

46. IIC cause serious and prolonged sleep deprivation, chronic, <sup>sleep deprivation,</sup>

47. Modern medicine clearly shows that sleep deprivation is detrimental to health, increasing diabetes, stress, heart disease, cardiovascular problems, anger, anxiety, depression and compulsiveness.

48. The activities of IIC (who are given their authority over other inmates by AOC staff) violate the 8<sup>th</sup> and 14<sup>th</sup> Amendments of the U.S. Constitution - free speech is abridged and their control of inmates - ordering them to do whatever they say is cruel and unusual punishment & punishment violates Due Process.

49. The CP has operated in this fashion for at least 10 years.

50. The IIC are in effect surrogates of or agents of the state, inasmuch as they are allowed by the state to control others.

51. The random, capricious, sometimes ludicrous actions of IIC breed and encourage distrust, hypocrisy and contempt for the system.

52. ~~Inmates~~ Inmates are required (a frequent "Treatment") by IIC frequently to carry their mattress and bedding up and down the hallway for hours.

53. As part of the CP an IIC may insist that a particular inmate is suffering from what IIC call a "core issue" such as childhood parental neglect or abuse, whether this is true or not. IIC may compel an inmate to admit to such an abuse, write essays about it, etc, or they will not pass a "class." Violates 24 Del.C. § 2502 etc.

Violated?  
24 Del.C.  
§ 2502  
(a) 2502  
2502  
2502



isolates  
24 Del. C.  
§ 3502 & 2

abolishes  
4 Del. C.  
§ 3502 & 2

54. In this and other ways, IIC act like psychologists or psychiatrists - a manifest absurdity.

55. I fear inmate participant ~~in~~ in GP does not agree with IIC on an issue he is told "dialogue should down" - which means "shut up." Again, failure to obey commands may result in delay or denial of completion of the program, hence, increased incarceration. Or punishment.

56. None of the materials or programs KA has read or experienced advocate such "Treatment." On the contrary, nearly all agree that discussion and listening are key to successful treatment for addiction problems.

57. The GP has existed and operated in the same way for so many years that The Warden and Commissioner must be aware of how it is run. They exhibit deliberate indifference.

58. Many D.O.C. professionals, members of the Board and the judiciary, either (1) do not know what actually goes on in GP or (2) have their heads firmly "buried in the sand" because the GP is a political convenience. It is convenient for the criminal justice system to shuffle people through the program, i.e. complete the program, get out of jail. No mind that most many will soon return because the GP is useless, right?

59. GP's operation is Nonsense, in the most simple, obvious meaning of the word. It is an EXTRAORDINARILY COSTLY convenience.

60. IIC's require (in order to "successfully complete" GP) that inmates admit their crimes. This poses an untenable "catch 22" dilemma for those with post conviction

Contention that it does not violate the 5<sup>th</sup> Amendment because it is inmates acting, not the State, is ludicrous and transparent. It is the State who gives the IiCs this power and authority. This violates 24 C.F.R. 2502

61. Inmate "facilitators" "teachers" and "instructors" of GP classes receive NO training to teach these classes. Of course, they are

62. Inmate "facilitators" "teachers" and "instructors" of GP classes are not qualified to teach them and some are in fact manifestly grossly unqualified and unable to impart any positive or constructive "teaching."

63. Similarly, The IiCs who control life on the tiers receive NO training or instruction (except from other unqualified IiCs) and are not supervised by D.O.C. personnel. They teach all classes.

64. The act of delegating all authority to IiCs (or the inaction) constitutes at least wanton or gross negligence by D.O.C., Warden Phelps and Commissioner Danberg.

65. KA is indigent, has no money, negligible assets, and debt over \$100,000, as evidenced by the attached Affidavit. In former papers, status requested.

66. Commissioner Danberg is requesting funding for construction of ~~facilities~~ facilities housing 900 more prison beds, another indication that D.O.C. "treatment" programs are not working.

67. In October 2007, a Sgt. Bryan was assigned to Victor Bldg. - New to Victor Bldg and GP. Sgt. Bryan, for one day, shut down all GP "classes" and so-called "treatment" activities on the tiers. The Head Facilitators (There is one for each of the 4 tiers) protested, saying that Commissioner Danberg himself allowed them to "run the tiers". After a meeting attended by D.O.C. staff including an officer of Captain rank, some Lieutenants, Sgt. Bryan, The Head Facilitators and others, all power and authority over life on the tiers was delegated ceded to IiCs, and the pointless punitive GP procedures, "classes"

not licensed.



68. One "BP" class" which KA attended on Nov. 1<sup>st</sup> 2007, was conducted as follows; The "facilitator" or instructor, began by saying: "OK, this morning we gonna kick it 'bout the cop that was shot in Philly." A lively discussion ensued among the  $\pm 10$  class participants about the merits of "cop killing" (when that may be desireable), what the shooter might have done with the dead officer's stolen weapon, etc.

The class ended after  $\pm 20$  minutes with the "facilitator" saying: "Fuck the cop; let's go eat." This is "treatment" ?? This helps men reform, change their behavior, respect the law, learn why they do what they do ??? Balderdash!

69. The BP participants are being profoundly short-changed, as are the taxpayers funding this activity.

70. KA knows of one IIC who was removed from BP for fighting, placed in the SHU for  $\pm$  a year, and then returned to BP as an IIC and was there as an IIC when KA was in BP!

71. KA does not know, but suspects and will seek to determine, that D.O.C. is receiving Federal funds for the operation of BP. If DOC is receiving said funds, KA contends that the operation of BP is so foul, lax, meaningless, as to constitute fraud in the <sup>and expenditure</sup> procurement of said funds.

72. The BP is a farce, a charade. In effect, the monkeys are running the zoo. The emperor has no clothes!

73. As stated, a BP participant must obey commands of an IIC, or be deemed not in compliance with the "program".

Violates  
24 Fed C.R.  
3302

capricious, hypocritical, and sometimes outright malicious, that they instill hatred, contempt and cynicism, disrespect in the inmates "enrolled" in GP. Hardly "correctional".

74. Life on the Tier in GP is unlike life in the general prison population - there, inmates are not in control of other inmates.

75. Less one attempts to describe this pet. tion as 'Frivolous', the fact is that GP is an extremely costly failure. (A) Men's (or women's) addictive behaviors are not understood or improved (B) Most, or many, therefore will continue their self-destructive behaviors, exacting an incalculable toll of human suffering (broken families, children abandoned, <sup>dead or injured crime victims</sup> causing more crimes, requiring further great expense for the criminal justice system. This Court may even take judicial notice of the fact that there is no rehabilitation at DCCs - it is obvious. See the editorial of the News Journal of March 6, 2008, attached hereto. This is a serious problem, indeed a matter of life or death, no doubt, for some assigned to GP and for some whom they might encounter upon release.

76. GP is a playground for prison bullies, who take positions as IICs, and some of them stay there for many (3 to 15!!) years!

77. In GP some IIC frequently falsely accuse inmates of rule violations and punish these inmates (with chores or physical tasks), the accused are not permitted to respond to these false accusations, but ordered to "Shut up" or be further punished.

78. In GP inmates (I was) are told to admit to rule violations which they did not commit. i.e. if the culprit is unknown, does not confess, all are encouraged to confess for "the good of the group", and punished if they do not! Any expert witness will testify that this is utter nonsense, to admit to something one did not do!



79. As mentioned hereinabove (Paragraph 13.) KA was removed from OP by DOC Guards. Part of the punishment for the alleged (Totally FALSE) 'assault on staff' is that KA is housed in the SHU for 2 years (unless KA can get these lying, ignorant, criminal guards into a courtroom sooner to expose the truth). It is KA's understanding that after the 2 years KA will again be classified to, or asked to complete, the OP, as it is part of his Court-Ordered sentence. KA intends to again attempt to complete OP so he can escape this zoo and become productive. Hence, KA does have standing, and the issue is one of controversy although KA is not currently in OP.
80. Some IIC violate prison rules and commit crimes while in OP i.e., smuggling food and drugs, even a cell phone, onto the tier. This further increases cynicism among OP participants.
81. The OP is wildly redemptive, run by some IICs who no doubt would be called pathological liars and bullies by any competent psychiatrist.
82. OP is so bad that KA has no doubt whatsoever that one or more medical professional, independent experts will testify (once they know the facts) that it in fact does more harm than good.
83. Inmates who might disagree with IICs are frequently told that they are "individual." Diagnosed as such by completely unqualified, antisocial inmates!!
84. Inmates in OP daily are demeaned by IIC, being called "psers", "creeps", or other names, and told to "get a job" and "get a life".

Violates  
24 Dec 8 3502

Violates  
24 Dec 8 3502

called "treatment." ~~It~~ is in fact antithetical to treatment!  
 85. KA is aware that Carl Daberg and Chief Deputy (Richard Koberlein) Attorney General attend GP "graduation" ceremonies and are aware of its operation. Again - heads in the sand, blind to the obvious. For the sake of keeping more bureaucrats ("counselors") and guards in meaningless employment, and for the convenience to the system in shuffling people through GP. It is great PR for politicians, from the Governor to the Lt. Governor or down, to proclaim, ERRONEOUSLY, that they are helping those in need. In reality, they are greasing the revolving door of recidivism, with the charade that is GP and other D.O.C. "treatment programs."

86. Mindful of this Court's propensity to dismiss pro se in forma pauperis claims by inmates, KA submits a "Memorandum in Support of Petition", attached hereto and incorporated by this reference.

87. KA does not have access to a law library, being housed in the SHU. KA must submit questions or requests in writing to the SHU Law Library and obtain the response from the paralegal or inmate Law Librarian. These responses, sometimes are on point, sometimes not. A response takes from 3 or 4 days to more than a month. Counsel, beyond one's current knowledge, could conduct necessary legal research far, far, far more efficiently and effectively.

88. IFCs every day punish some other inmates on the tier (ordering physical exercises, chores, carrying mattress for an hour, etc.) summarily, without cause or reason, violating due Process protections of the Constitution. There is no hearing, not even the option to refute the false ~~et~~ or capricious charge. Any discussion is clear violation of the right of free speech protected by 1st Amendment.



89. KA's witnesses may include, among others: Danberg, Phelps, "Counselor" Thompson, Spence, ~~"Counselor" Thompson~~, Lt. Porter, classification officer, Winfred Brown, Roger Boatwain, Carl Schyler, Norman Ingram, Eli Fountain, Mike Glan, Blair Thomas, Kenneth Garrison, Charles Cardone, Marlin Luke, Juaguna Davis, Vincent Cleveland, Jerry Smith, Lamont Harris, Mike Egolf, Kevin Dixon, D. Spence. One or more Psychiatrist, ~~Psychologist~~ or other Mental Health "expert witnesses".

An investigator hired by counsel or appointed by the Court, to investigate the truthfulness of any or all of KA's claims. Independent investigator. None of whom KA can communicate with from the SHU.

90. KA was in the "Carigenes Crest Treatment Program" from 1/9/07 until late April, 2007. Although the "Crest Program" is not a subject of this Petition, KA submits that it is not a suitable alternative to O.P. ~~The~~ "Crest Program" is good on paper. However, its actual operation is not at all in line with the program as described in the papers. In many ways it is even more chaotic and harmful than O.P. KA can, with counsel, produce ample evidence to prove this. Therefore KA asks this Court to consider expanding the scope of this petition to include the operations of "Carigenes Crest Treatment Program."

91. KA submits that ~~the~~ any costs associated with this Action will be far outweighed by the monetary and other profoundly significant benefits to Delaware taxpayers and inmates subjected to Treatment, and the victims of crime, if the O.P. is terminated or significantly improved, while O.C.'s "Treatment Programs" may





95 - Life on the tier in Victor Bldg (GP) is such that on a good night an inmate might get 7 hours' sleep. Most nights 5 or 6 hours is more likely. Each morning, except most Sundays, all inmates (except ITCs) are required to attend "formation" in the hallway for 1 to 2 1/2 hours (this is a twice daily routine) beginning at 6:00 AM. However, sometimes (on average  $\pm 2$  days a week) an ITC will summon all inmates (except ITCs) into the hallway for "formation" or a "listen up" (some announcement or pronouncement) for at  $\pm 1:00$  AM or 2:00 AM and keep them in the hallway until morning "formation" (inmates leave the building for breakfast in the mess hall). This awakening does not apply to other ITCs (those who are not controlling the particular "treatment" or activity) they are allowed to sleep, and they are excused from formations - so they are far more well-rested than the other inmates on the tier. This awakening and other activity causes chronic sleep deprivation. KA suffers swollen glands in the throat upon sleep deprivation, and had swollen glands during the entire time in GP. KA also no doubt suffers some of the other health problems resulting from sleep deprivation mentioned hereinabove, some known, some probably unknown. Known include stress, anxiety, irritability. Sleep during the day is prohibited or impossible. This is different than life in the general prison population and is a hardship and unconstitutional. During one nine day period, KA was able to sleep only 22 hours!

(96) Each of the 4 tiers in Victor Bldg. contains 13 cells. Men are housed 3 per cell (one reason sleep is inadequate) except for one or two cells holding the ITCs titled "Facilitator" and

"Head Facilitator". Other Dics have titles of "2<sup>nd</sup> Sgt.(3)" "1<sup>st</sup> Sgt.(2)", "Co Facilitator (2)" <sup>secretary</sup> ~~the one whose title I cannot recall is really horrible in notes~~, "Drill Sgt.", "Logician". All others are "regular" inmates in GP "treatment" program. Thus, usually 9 out of the population of  $\pm 35$  patients are Dics.

97. Because of all of the daily hypocrisy, injustice, false accusations, ridiculous "diagnoses", unwarranted punishments, lies, etc. nearly all of the inmates ridicule, mock, curse, disparage and disrespect the Dics without their knowledge (and the system which permits it). And, of course, they have the attitude "if Dics act this way I will too."

98. In GP, real introspection, the real key to "curing" addictions and modifying destructive behaviors is almost wholly absent. The first casualty in the "war on drugs" is the truth. Dics constantly lie, lie, lie. Many are bullying cowards, whose greatest fear is the truth. Unless and until GP participants admit, recognize, identify and confront the truth about why they do what they do, they will not improve.

<sup>update  
realt  
2502</sup> Dics further purport to "diagnose" other inmates as "over reactive" or "under reactive," require men to admit to particular mental health problems or "core issues," or be punished. Science shows that mice will, given a choice, choose cocaine instead of food and water, to the point of death. Do they have "core issues?"

100. Imagine having been fortunate to have had 2 of the greatest parents extant (however "great" may be defined) a wonderful, happy childhood and upbringing, and being told you must write an essay on how your parents abused or neglected you!! This is the absurdity which is GP. This and more.

101. During a one week period in GP, A was punished by Dics more than 22 times. This conduct is not atypical. For the same "offense", which was no offense.

102. The total relinquishing of authority - ceding it to Dics - is unlawful and unethical.

the mice choose to death choosing cocaine



103. Several times during every week, inmates are punished by JICs without cause, wrongfully.

104. The way BP in fact operates, the length of other inmates' incarceration is determined by other inmates!! Because the JICs actually determine who "passes" and when they do so, or whether they "fail," and prisoners' sentences are 'suspended upon completion of BP' length of incarceration is dependent upon the conduct of wholly unqualified JICs. Although defendants no doubt will deny this, arguing that of course" DOC personnel determine who "passes" or "fails"; this is NOT TRUE. DOC personnel ask the JICs for these determinations, rely on them, and act on them!! The Monkeys run the Zoo and control the keys to the cages. The situation, the reality, is unconscionable.

105. The JIC in BP are provided materials by DOC personnel, including photocopies of pages of psychology books, and then 'turned loose' with these materials with NO guidance, instruction or qualification. A clear indication that D.O.C. knows JIC are "teaching" the "classes" and that they have been placed in control by D.O.C. Probably the psychiatric equivalent to giving a 3 year old a loaded automatic weapon in a crowded room.

106. The Alcoholics Anonymous and Narcotics Anonymous, and Albert Einstein define INSANITY as "doing the same thing (i.e. consuming alcohol or drugs) over and over and expecting a different result!!" The operation of BP is such an insanity and the result is recidivism, recidivism, recidivism!!

107. On one occasion in BP, the "Facilitator" (the #2 in command or the Tier 1 soon to be elevated to the #1 JIC spot of "Head

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Facilitator") came into my cell to explain to me why

I was being punished. We engaged in conversation for about 10 minutes, His "reasons" and "arguments" were ridiculous, false, and astonishingly illogical. When he left I asked my 2 cellmates: "Let me ask you guys, j-st tell me straight up, did what he just said make sense to you." One laughed and said "No," The other said "Boy am I glad you asked me that. I was just sitting here wondering if I am crazy, because what he said made no sense whatsoever."

108. Frankly, KA is not sure whether this situation is an abandonment of authority or a delegation of authority by the bottom line is: Inmates control the prison, act as psychologists, "teach" courses, discipline and met out punishment to other inmates and defendants CD, PP, and all other DOC personnel. Know to the placing of inmates in positions of authority and supervision over other inmates is unconstitutional. McClatter, Estelle, 935 F.2d 682 (5th Cir 1991)

109. There exists in GP an egregious failure of the guards to protect inmates from the whimsical, arbitrary and capricious ~~punishments~~ Summary punishments ~~administered~~ administered by FICs.

110. Decisions, decisions which determine whether inmates are released or subject to further incarceration, are being made by inmates/FICs.

111. KA has never been involved in any case in US District Court, is unfamiliar with the Court Rules, has never filed a Declaratory Judgment action in any court, and is unfamiliar with that body of law.

5/6/08 Respectfully Submitted,  
with Memo and Exhibits

V. T. A. K.



## Memorandum in Support of Petition

— The Key ingredient for success in the courtroom in any legal proceeding is preparation. It is impossible for KA to prepare this case from SHU housing.

— Appointment of Counsel — KA is indigent. As a result of D.O.C. guards' (TOTALLY FALSE) accusations of "assault on staff," KA is housed in SHU for at least two years from 11/12/07. (as for the 15 days in the hole?), It is against D.O.C. policy, forbidden, for KA to contact or write to other inmates, KA is confined to the cell at all times except for "rec" in the enclosed concrete "yard" 3 times a week. KA has no visitors and nobody to call. KA is allocated 16 regular envelopes, 4 postage stamps, 1 pen and 1 pad of paper per month. KA cannot make a phone call except collect calls to preapproved numbers. Hence, there is virtually no way for KA to contact anyone to prepare this case. D.O.C. witnesses will not cooperate, communicate with or respond to KA and in fact have refused multiple requests for information (i.e. Names and titles of D.O.C. Mental Health officials, others affiliated with OP, etc - requests completely ignored). The standard, or criteria, for the Court to consider appointment of counsel is enunciated in Smith v. Petsock, 741 F.2d 22 (3d Cir 1984), Tabron v. Grace, 6 F.3d 147 (3d Cir 1993), Montgomery v. Pichak, 294 F.3d 492 (3d Cir 2002). The most significant factors to be considered include: (1) Plaintiff's ability to present the case. Here, Plaintiff cannot communicate with witnesses, much less prepare them for trial. Plaintiff's access to the law is severely abridged and limited and cumbersome, as described in the Petition. Plaintiff is unfamiliar with Federal Rules concerning discovery and other

important procedures. (2) The difficulty of the particular legal issues. Here, the issues are complex, involving state statutes and a large body of constitutional law, including many cases interpreting the 1<sup>st</sup>, 5<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> Amendments, and the entire body of law controlling Declaratory Judgments, all of which are new to Petitioner.

(3) the degree to which factual investigation is necessary and the ability of plaintiff to pursue investigation. Here, clearly significant investigation is necessary for this Court to render an enlightened, just, correct decision. Equally clear is plaintiff's virtual investigative paralysis in the SHU. He can investigate nothing. Requests for pertinent information (even his own "mental health evaluation") are ignored.

(4) Plaintiff's capacity to obtain counsel. Plaintiff cannot, plaintiff is indigent. (5) the extent to which a case is likely to turn on credibility determinations. Here, the state will no doubt seek to maintain the status quo, (the convenience of the ineffectual system) and deny many allegations which are true. The State will not admit or acknowledge its ineptitude or wrongdoing. The conduct described in the Petition has been entrenched for many (15?) years. (6) whether the case will require expert witnesses. Here, obviously, the testimony of one or more (Addiction-Mental Health) well recognized, well qualified, highly respected independent expert witnesses will be necessary. Petitioner cannot possibly even identify or locate any such witness, and, again, cannot prepare said witness for trial. The case presented for Declaratory Judgment is complex and arguably meritorious, and Plaintiff cannot present it without counsel. Substantial prejudice will result without counsel.

— The Petition is to be liberally construed, and the Court must accept ~~all~~ all factual allegations (and all reasonable inferences to be drawn from the allegations) as true and take them in the



"Memorandum"

right most favorable to Petitioner, Ericsson v. Pardon - U.S. - 127 S.Ct. 2147 (2007), Christopher v. Harbury, 536 U.S. 403 (2002), Conley v. Gibson, 355 US 41, 78 S.Ct. 99, 2 L.Ed. 2d 80 (1957).

- KA has requested via mail that three excellent Delaware lawyers assist him in representing him pro bono, or for whatever compensation the Court may award. None has agreed to do so, which is understandable inasmuch as the proper presentation of this action should be a substantial undertaking; substantial but more than worthwhile.

- Supervisory officials (Chere, CD, PP, "counselor" Spence and others) created a policy or custom under which unconstitutional practices occurred, or allowed such a policy or custom to continue. Williams v. Smith, 781 F.2d 319 (2d Cir. 1986), Langley v. Coughlin, 715 F. Supp. 522, US Dist. Ct. NY, 1989, i.e. the complete control of the Pier by D.Cs.

# "Memorandum"

— The existence of another adequate remedy does not preclude a declaratory judgment that is otherwise appropriate, Rule 57.

— Declaratory relief does not share injunctive relief requirement of irreparable harm. Levin v. Harleston, 966 F.2d 85 (2d Cir 1992).

— KA was in OP and will again be in OP, as explained in paragraph 79 of Petition. Declaratory judgment affords a remedy to one who is uncertain of his rights and who desires an early adjudication thereof without having to wait until his adversary may decide to impair him. Okpalobi v. Foster, 190 F.3d 337 (5th Cir 1999), 244 F.3d 495 (5th Cir 2001).

— The granting or denial of declaratory relief is discretionary, and will not be disturbed on appeal in the absence of a clear showing of abuse of discretion, provided sound judicial discretion is exercised. Wills v. O'Grady, 86 Ill App 3d 75, 409 NE2d 17 (1st Dist, 1980), Ann Jur 2d § 14.

— Where a case is properly before the trial court, under a complaint that is legally sufficient and that sets forth facts and circumstances allowing that a declaratory adjudication is appropriate, the trial court may not properly refuse to assume jurisdiction. BKHN Inc. v. Dept. of Health, 3 Cal App 4th 301, 4 Cal Reptr. 2d 188, (6th Dist. 1992). If it does enter a dismissal, it will be directed by an appellate tribunal to entertain the action. also BKHN case. Declaratory relief must be granted when the facts justifying that course are sufficiently alleged. also BKHN case, and Columbia Pictures Corp. v. DeToth, 161 P.2d 17.

— KA has standing, showing a substantial controversy of sufficient immediacy and reality to warrant the issuance



of a declaratory judgment. KA presents a justiciable controversy. KA shows both actual present harm and the significant possibility of future harm, demonstrating the need for "preenforcement review." AM Sur 2<sup>d</sup> Declaratory Relief, § 21. KA was in the GP and personally subjected to the physical and other arbitrary, whimsical, malicious, punishments and extreme verbal abuse ordered by IICs and described in the Petition, and remains Court Ordered to "complete GP."

→ KA has "a personal stake in the outcome." AM Sur 2<sup>d</sup> Declaratory Relief, § 31.

→ This Declaratory Judgment case is "ripe" in that the facts have sufficiently coalesced to permit an intelligent and useful decision to be made, and the judgment will be of practical help or utility. AM Sur 2<sup>d</sup> Declaratory Relief, § 31.

→ A state prisoner may seek declaratory judgment relief regarding conditions of confinement, so long as the reliefs not addressed to the duration or legality of confinement. Robinson v. Leahy, 401 F.Supp 1027 (N.D. Ill 1975). AM Sur 2<sup>d</sup> Decl. Relief, § 52. KA contends that the state sanctioned conduct and actions of IICs described in the Petition, individually and cumulatively, constitute cruel and unusual punishment, an unlawful "condition of confinement" and the many Constitutional Rights violations mentioned in the Petition. Declaratory Relief will not be denied merely because of the possibility of some other form of remedy, AM Sur 2<sup>d</sup> Declaratory Jmt, § 11, § 54, § 55, 28 U.S.C. Code § 2201(a).

→ The parties to an action for Declaratory Jmt. are entitled to a jury trial as to all questions of fact raised in the action. AM Sur 2<sup>d</sup> Declaratory Jmt, § 238.

## "Memorandum"

- "Counselor" Thompson, "Master Counselor" Spence, and others similarly situated are holding themselves out to be or acting as qualified to practice psychology as defined by 24 Del.C. § 3502(4). Or they are acting as "psychological assistant" as defined by 24 Del.C. § 3502(5). They are in violation of 24 Del.C. § 3502 in pertinent parts, and in violation of 24 Del.C. § 3507 (a) and (c). KA contends that they are not qualified, licensed, and registered as required.

- IICs in of clearly, regularly, in their "teaching" of "classes", "purported diagnoses", and running of the tier also are in violation of all statutes mentioned above. For example, when an IIC insists that an inmate (including KA) admit to childhood neglect or abandonment as the "cause" of addiction, that he write essays to that effect, or he will not "complete the GP," when, in fact, IIC has absolutely no idea whether this may be true. None of the IICs is licensed as required. They are in fact guilty of a gross demeanor, 24 Del.C. § 3520. See sections attached.

- Danberg (CD) and Phelps (CP) are named not only because of their gross or wanton negligence, deliberate indifference, but because all necessary parties must be named in Declaratory Judgment action. ADJ Sur 2<sup>d</sup>. Prisoners were (are) allowed to violate the numerous, serious Constitutional rights of other prisoners by the knowing deliberate indifference of CD & CP, and perhaps at the supervisor and direction of the correctional system. Full discovery will determine the latter.



- The conditions described to exist in CP (the control and specific acts of EICs) impose an "atypical and significant hardship on the inmate in relation to the ordinary incidents of prison life." Griffin v. Vaughn, 112 F<sup>3d</sup> 703 (3<sup>d</sup> Cir 1997), Sandlin v. Conner, 515 U.S. 472 (1995).
- The deliberate indifference of CP and PP to the numerous violations of inmates' rights could (does) give rise to a civil rights action holding them liable. Sample v. Dicks, 885 F<sup>2d</sup> 1099 (3<sup>d</sup> Cir 1989), City of Canton v. Harris, 489 U.S. 378 (1989), Wilson v. Serfer, 50 U.S. 294 (1991).
- KA is aware that inmates have no right to a treatment program. This does not change the fact that CP is unlawful and unconstitutional in its operation as specified in the Petition.
- \* The Court "must accept as true (which they are) the factual allegations in the complaint (Petition) and all reasonable inferences that can be drawn therefrom." Nami v. Fauver, 82 F<sup>3d</sup> 63, (3<sup>d</sup> Cir. 1996), Allan v. Serverling, 229 F<sup>3d</sup> 220 (3<sup>d</sup> Cir 2000).
- Each and every day in CP sections of Title 24 Del.C. cited by KA are violated. KA has found no statutory or other authority making exceptions for P.O.C., EICs, etc. KA has requested of the SHU Law Library what authority is there for this conduct. And, indeed, the conduct of P.O.C. personnel who conduct "mental health evaluations," etc., who are not qualified to do so. SHU Library has shown KA no exceptions. See 11 Del.C. § 6505, describing authority of A.C.
- The ill-conceived, haphazard operation of CP over many years constitutes wanton negligence and deliberate indifference to inmates' mental health.

## "Memorandum"

→ In Declaratory actions, even when relief is denied, the rights of the parties must be declared. The action should not be dismissed, but rather, the declaratory judgment should be issued denying relief. AM Jur<sup>2d</sup>, Declaratory Jmt, § 244.

→ Injunctive relief may be granted by the Court to protect or enforce its declaratory judgment. AM Jur<sup>2d</sup>, Declaratory Jmt, § 268. Here, injunctive relief is sought and necessary.

→ A state's sovereign immunity does not bar certain actions against state officers for injunctive and declaratory relief. AM Jur<sup>2d</sup>, Declaratory Jmt, § 213.

→ Sovereign immunity, in any event, does not apply or insulate the state because the actions (and, perhaps more importantly, inaction) described in the Complaint have continued for many, many years, known to the highest state officials (e.g. Don Berg) and constitute gross or wanton negligence, an exception to the shield of sovereign immunity. See Cal. statute on sovereign immunity, 10 P.S. § 400.

→ Since "deliberate indifference" is almost never admitted it can be proven with inferences from conduct and circumstances. If prison officials know or should know of conduct and have not corrected it, "deliberate indifference" is established. Wilson v. Senter, 501 U.S. 904, 115 S.Ct. 232 (1991), Johnson v. Herman, 132 F.Supp. 1130 (N.D. 2001), Hope v. Polzer, 240 F.3d 925 (11th Cir. 2001). KA will prove CP & PP at least "should have known" about unlawful conduct in CP. In fact, how could they not know that there were no D.O.C. employees teaching in CP, no qualified people running this "program"? The many, chronic, continuous violations of rights mentioned in the Petition constitute



cruel and unusual punishment, violating 8<sup>th</sup> Amendment, i.e. chronic sleep deprivation, being compelled to perform <sup>physical</sup> activities etc.

- Further, the being falsely accused of rule violations, falsely told one suffers from a particular mental illness ("cover issue"), and arbitrarily & summarily punished, not permitted to speak, on a daily basis, cause mental anxiety, mental anguish, misery, and these are sufficient to state a claim under the 8<sup>th</sup> Amendment. White v. Napoleon, 897 F.2d 111 (3<sup>rd</sup> Cir 1990), Scher v. Engelke, 943 F.2d 926 (8<sup>th</sup> Cir 1991). Also violates Due Process.

- With injunctive cases, the focus of deliberate indifference is "broader and more generalized" than damage cases, with the emphasis on the "combined acts or omissions" of prison officials. [Exactly what KA will prove at trial] In such cases, courts have held that liability can be premised on a showing of "repeated examples of negligent acts which disclose a pattern of conduct, or by showing 'systematic or gross deficiencies in staffing or procedures.'" Edgar, precisely what the evidence will show] Leer v. Murphy, 844 F.2d 628 (9<sup>th</sup> Cir 1988), French v. Owens, 777 F.2d 1250 (7<sup>th</sup> Cir 1985), Ramos v. Lamm, 639 F.2d 554 (10<sup>th</sup> Cir 1980), Fisher v. Koehler, 692 F.Supp 1519 (S.D.N.Y. 1988).

- In 6<sup>th</sup> There exists (and has for years) a systematic failure of "counselors" in training or supervision (of Dics). Liability therefore can be imposed upon CD+PP.

- KA has discovered, and perhaps should have realized when he received the first (FALSE) "Disciplinary Report" within a week of incarceration, the administration of D.C. has ABSOLUTELY NO interest in the truth, WILL NOT acknowledge personnel wrongdoing, however serious (beating an inmate nearly to death) and is concerned only with its "we stick together" "cover your ass" mentality. This pathetic management mantra permeates D.C., from CD right down to TCos on the floors who have no inclination that the law applies inside these walls!!

unmemorandum  
 A claim under 42 U.S.C. § 1983 can be based on officials' Failure to act.

→ Inmates' Constitutional rights may be violated by State (D.O.C.) officials' failure to act. Smith v. Ross, 482 F.2d 83 (6th Cir. 1978). Here, the state D.O.C. officials fail to control EICs and other inmates in the tiers of Victor Bldg - the OP.

→ Failure to provide adequate medical care (here, mental health care) to prisoner rises to unconstitutional conduct because the facts alleged establish deliberate indifference to serious medical needs. DuPont v. Supp, 668 F.Supp. 385, 1987. Here, serious mental health needs.

→ 11 Del.C. § 6536 provides that D.O.C. shall promulgate reasonable standards, and shall establish reasonable health, medical and dental services. The conduct and operation of OP is by no standard reasonable.

The way OP operates, with EICs actually determining who "passes" or "fails," inmates' length of incarceration is determined by other inmates (EICs). Inmates with no training, qualifications, guidance or supervision in what they are doing. This not only violates Due Process and is clearly unconstitutional, but defies common sense. In plain English, the situation is appalling and unjustifiable. And violates Del. Statutes.

416  
 - Note - SHU Law Library refused to copy pertinent sections of Del Code referred to herein, marked as to applicability, namely the sections of Title 24 §§ 3502, 3501, 3507 and 3520. This deletion emasculates this pleading, as sections of the law are quite explicit in their definitions and requirements and are transgressed daily in OP.



There is no Constitutional right to a treatment program. This is settled law. Dismissing this Petition by saying "Inmates have no right to a treatment program" would be analogous to dismissing a complaint that inmates are forced, day and night, to bang their heads into cinderblocks to reduce them to pebbles for a prison pathway by saying "inmates have no right to a work program."

→ This is not a civil rights claim, but the numerous civil rights issues and violations mentioned, causes for liability, are indicative of the problems with the unlawful CP.

→ KA will soon (± today) file the necessary lawsuit against guards Bryan and Smith.

## "Memo" in support of Petition.

- 24 Del.C. § 3502 states in pertinent part:

(4) "Practice of psychology" shall mean the observation, description, evaluation, interpretation and/or modification of human behavior by the application of psychological principles, methods, and/or procedures, for the purpose of preventing or eliminating symptomatic, maladaptive or undesired behavior, and of enhancing interpersonal relationships, work and life adjustment, personal effectiveness, behavioral health and mental health."

This is precisely what occurs in "CP"! § 3502 goes on to ~~say~~ define the meaning of terms used in the statute. KA cites and relies upon the statute, and 24 Del.C. § 3507 and 3520 in their entirety.

— See also 24 Del.C. § 3507(a):

- 24 Del.C. § 3507(c) states: "No person shall act as a psychological assistant, ~~unless such person has been~~ or hold out that that person is a psychological assistant, unless such person has been duly registered by the Board under this chapter

- § 3502(5) defines "psychological assistant" as a person registered with the Board to "perform certain functions within the practice of psychology", meaning § 3502(4) quoted above.

(over)



- 24 Del.C. § 3520 provides that a person not currently licensed, when engaging in "the practice of psychology" or "acting as a psychological assistant", "shall be guilty of a misdemeanor."  
See § 3520 in its entirety.

Neither the DICS nor "Counselors" Spence or Thompson or others similarly situated are in compliance with chapter 35 of 24 Del Code.

Memorandum - last page of memo "in support of Petition"

- P knew this was going to be an uphill fight (getting something done about the wildly lawless, repetitive criminal conduct of guards and managements - from Danberg on down - complete acquiescence in it), but the degree (slope) of this mountain is ridiculous! This is true because Justice Brennan did not realize the depth of understatement in these words when he wrote:

"Prisoners are persons whom most of us would rather not think about. Banished from everyday sight, they exist in a shadow world, that only dimly enters our awareness... When prisoners emerge from the shadows to press a Constitutional claim, they invoke no alien set of principles drawn from a distant culture. Rather, they speak the language of the charter upon which all of us rely to hold official power accountable. They ask us to acknowledge that power exercised in the shadows (I add: against virtually helpless individuals) must be restrained at least as diligently as power that acts in the sunlight."

O'Leary v. Estate of Shabazz, 482 US 342, 354-55, 107 S.Ct. 2400, 96 L.Ed 282 (1987).

Indeed, the problem is - no accountability. This Court is the only hope for justice.



Wherefore, KA respectfully requests that this Court:

(A) Conduct a hearing, wherein the facts and assertions mentioned herein will be proved and established beyond doubt. A Trial.

(B) Appoint Counsel to represent KA in order to aid in investigation, prepare witnesses, locate and prepare ~~any~~ expert witnesses necessary, and better articulate the legal issues and <sup>presently</sup> the case arising from the facts.

(C) Grant KA's in forma pauperis request. Affidavit attached.

(D) Enter a Declaratory Judgment that the GP as operated by D.O.C at all of its facilities is unlawful and unconstitutional.

(E) Order D.O.C.'s GP shut down, ceased, closed, compelled to stop operating immediately, and/or

(F) Or, in the alternative to (E), order a restructuring of GP to bring it in compliance with the law, with qualified licensed counselors <sup>and</sup> instructors and order the appointment of an independent, respected Monitor with the power to oversee the restructuring and ensure D.O.C.'s compliance with the ordered restructuring, and require Monitoring for at least two years.

(G) Grant or Order any other relief which it may deem necessary and just.

(H) Consider effecting more positive change by expanding the scope of the proceeding to include "Civigenics Crest Treatment Program" and other D.O.C. "Treatment programs";

although the "Crest Program" is the only other one which KA has experienced, and concerning which, with counsel, can produce abundant compelling evidence of state sanctioned chaos.

- (F) KA requests trial by jury on all issues of fact, but may later agree to trial by Court.
- (G) Require that all DOC inmates Court ordered to "complete & P" be re-sentenced.
- (H) KA is not seeking monetary damages; KA does request whatever amount this Court may deem reasonable as pro se "attorney fees," for the time and effort in this case. KA worked 14 hours today, 3/29/08, and 6 hours yesterday, and many other days.
- (I) Award KA costs and fees of this action.
- (J) Any sum awarded pursuant to the request in (H) above, KA will immediately pay as part of the restitution he owes for the criminal, foolish, irresponsible conduct which led to incarceration.
- (K) The "Memorandum in Support of Petition" is incorporated.

Respectfully Submitted,  
 K. D. Abraham  
 Kenneth Abraham

### Certificate of Service

I hereby certify that on this 6<sup>th</sup> day of April, 2008, I did mail a copy of this Petition, together with all 62 pages, to the following party, who represents all defendants:

Attorney General - State of Delaware  
 Dept. of Justice - Canal State Ofc. Bldg.  
 820 N. French St. Wilmington, DE 19801

K. D. Abraham  
 Kenneth Abraham



Personal For:

4/2/08 To: Joseph "Beau" Biden III  
 Attorney General - State of Delaware  
 Carver/State Ofc. Bldg.  
 820 N. French St.  
 Wilmington, DE 19801

From: Ken Abraham, 173040  
 SHU19 B-V-4, D.C.  
 1181 Puddick Rd.  
 Smyrna, DE 19977

Re: Criminal Complaint

Dear Mr. Biden,

I know from experience the discomfort in having to investigate and prosecute fellow law enforcement officers. I also know the critical value and benefits of doing so when necessary.

The officers named are a DISGRACE to law enforcement and the people of Delaware, and all those officers who do their jobs properly are tainted by these few.

Some benefits, far more significant than redressing the personal wrongs done to me, include:

(A) Sending the message which this institution sorely needs to receive: "the law applies inside these walls!"

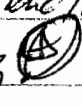
(B) Successful prosecution of the criminals wearing D.O.C. uniforms will no doubt deter others, hopefully put a dent in the "culture of cover up" and effect some change in the current D.O.C. attitude of absolutely no interest in the truth.

(C) The U.S. District Court for the District of Delaware is besieged with burdensome complaints from inmates. Some no doubt are spurious; sadly for Delaware, too many have merit. Successful prosecution of matters addressed herein will reduce the necessity for such Federal actions.

(Over)

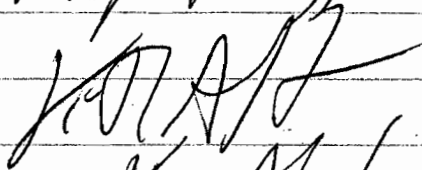
I am aware too of the "unpopularity" of "helping" inmates. Justice Brandeis eloquently described the plight of abused inmates by noting that prisoners "live in society's shadow" with most not wanting to "get involved."

It is because inmates are so relative helpless that you should administer justice. It is precisely because others with the power to intervene and ensure justice have turned their heads that the current problems persist.

With this letter, my Affidavit, and the other enclosures I implore you to begin a genuine investigation. 


Thank you for your consideration.

Crimes: assault & battery, false reports  
false imprisonment, Hate crime, 18 USC (3041) in the  
opening of US Mail to News Journal and retaliation for  
law suit & correspondence. Numerous civil rights violations.

Respectfully,  
  
Ken Abraham

P.S., internal "grievance" process, which I have exhausted, is  
a wildly ridiculous joke - a farce. Were you here to witness it  
you would agree!!!

KRA

 Investigation expedited by giving Smith & Bryan a polygraph w/ examples.

- ① Did Mr. Abraham curse and swear on 11/12/07?
- ② Did " " attempt to stab anyone with anything on 11/12/07?
- ③ Did anyone "wrestle Mr. Abraham to the floor?"

If They answer "Yes" to any you'll see their LIES!



With letter  
to Beau Biden  
re: Criminal complaint  
mailed 4/2/08

4/2/08  
Affidavit  
I, Kenneth Abraham, on this 2<sup>d</sup> day of April, 2008, do swear and affirm that every statement of fact in the following documents (attached and hereby incorporated as part of this Affidavit by reference) is true and correct, under penalty of perjury or other law:

- (1) "Letter to FBE" of 11/2/07
- (2) "Letter to Rosenberg" of 11/28/07
- (3) "Statement" of 11/13/07
- (4) "Summary of Problem" of 1/20/08
- (5) Letter to Col. MacLeish of 1/27/08

Further, I am willing to answer any and all questions posed by the office of the Attorney General and am willing to take a polygraph exam in connection with this matter.

This Affidavit is submitted with my letter to Mr. Biden (Joseph "Beau" Biden III) of 4/2/08 seeking a full investigation of these matters, consistent with his oath of office and 29 Del. C. § 2504(4).

I, K-MAK, swear and affirm that  
Kenneth Abraham

The above (and incorporated) information is true and correct and is made under penalty of perjury.

Dated: 4/2/08

Brian D. Englem  
Notary Public, State of Delaware  
My Commission Expires June 14, 2008

SWORN TO AND SUBSCRIBED before me,  
this 2<sup>nd</sup> day of April, 2008, Brian D Englem  
title - Notary

11/7/07

From Kenneth Abraham  
Deputy Attorney General 74-79  
inmate 173040, Victor B-1  
DCC 1181 Paddock Rd, Smyrna, DE 19977

To: Agent in Charge

FBI

Re: Pressing charges to have two D. O.C. guards arrested, tried and convicted. Assault and battery, violation of constitutional rights, conspiracy. The problem is so entrenched, maybe even RICO. And, once an investigation begins, probably obstruction of justice. Yes, I'm serious!

Greetings. Inasmuch as I am an inmate, below are four people who know me at least well enough to vouch for my veracity. Moreover, I am more than willing to take a polygraph exam concerning anything I have to say. The four are:

Myron Steele  
Chief Justice -- Supreme Court of Delaware  
302-739-4214

Dick Wier  
former Attorney General of Delaware  
302-888-3222

Henry DuPont Ridgely  
Justice- Supreme Court of Delaware  
Hank at home: 302-697-1551

Charlie Oberly  
former Attorney General of Delaware  
302-576-2000

And Joe Biden, Mike Castle, Tom Carper

Were it not for the **EGREGIOUS, OUTRAGEOUS**, pattern or practice of what I have seen and experienced; the systemic problem, I would not go through what I am about to go through. There are some very rotten apples in the barrel- a disgrace to law enforcement! The problem is serious and ongoing, no doubt because they have gotten away with it so many times. When the police prey upon the nearly helpless, who will bring them to justice? You can help do exactly that.



Having heard that guards at SVOP in Sussex County spray and beat inmates "for sport", I arranged to be sent to the "sanction pod" at SVOP in Georgetown. It worked; I was there from April 29 through May 14 of this year. I have kept detailed notes since my arrival in the institution on Jan 3, 07.

On May 9, I saw two guards approach an inmate from behind, as he was walking away from them, spray him with pepper spray, hit him, and slam him into the steel door. This attack was unprovoked and unjustified, and all too typical! The unusual thing about this incident is that the "mean spirited little men in a uniform" lost their cool before so many witnesses. About 20 others saw this and I can put you in touch with several. Such attacks usually are conducted out of sight of non DOC witnesses in a well orchestrated procedure.

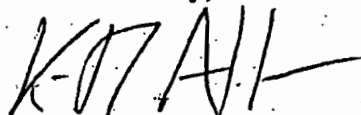
On May 10, a Cpl. Mann and a Lt. Costello attacked me. With no (zero, zip, none, nada) justification or provocation. Indeed, my reaction to their verbal abuse (guards routinely call inmates "asshole" and "shithead" and try to provoke them) was so unusual that they were puzzled, called the Lieutenant, and then proceeded. While I was handcuffed, silent, and seated in a chair, they sprayed me with pepper spray, picked me up – snatched me out of the chair- threw me to the asphalt, kicked me in the head and deliberately injured my arm. After the attack, when I tried to wipe my eyes, Lt Costello shouted: "If you raise that arm again, I'll tear it off." To which I replied "nothing will surprise me." They then threatened to repeat this behavior every hour: they changed their minds when I let them know that I have <sup>cross</sup> examined thousands of lying witnesses and was looking forward to introduce them to a jury. Lt. Costello said: "you can't prove shit."

It is with great shame, remorse, and guilt that I tell you I am here for using cocaine and, worse, stealing money to get more poison. It is a powerfully pernicious poison. I shall answer candidly any questions.

This is the tip of a not melting iceberg. Please contact me to have these two arrested.

Please.

Most Sincerely,

  
Kenneth Abraham

Injury to head, leg, back, arm, neck,  
shoulder. KRA

copies to others

See also U.S. Dist. Court  
Case # 07-593  
Abraham v. D.O.C. et al.

I have some credible witnesses and ways to (for you) to reach them. One responsible person who can shed light on significant D.O.C. and S.V.O.P. abuses, including those he experienced, is Charles Cardone, #098159.

Another person beaten and kicked by D.O.C. personnel at S.V.O.P., while handcuffed, is Curtis Collins, now in SHU at D.C.C. - He sustained two broken ribs.



To: Mr. Carl Danberg  
Commissioner, DOC

From: Kenneth R. Abraham  
inmate 123048 SHU 1000  
Deputy Attorney General 74 to 79.

11/28/07

re: in the "take" from 11/12 through 11/26 and Five (5) YEAR sentence, based on  
OUTRAGEOUS, UNLAWFUL RETALIATION FOR CONTACTING  
The FBI and more.

Dear Mr. Danberg,

It is more than a little disappointing to see law enforcement officers  
of my home state, your employees, acting like this. Quite an understatement.  
One of 2 things is going on: ① You are part of the problem, or ② You have lost  
control of your Department. Either way, it is a sorry, serious, mess. You used to  
be A.G. I knew three former Attorneys General: Laird Stabler, Dick Kuren, and  
Charley Oberly.

As you know despite your internal affairs "investigation," I was attacked  
by 2 of your guards in Georgetown on May 10<sup>th</sup>. It is what they do: "spank" people  
for sport and beat them, as most people who work at SVOP and all who have  
passed through it very well know.

Since May, despite submitting 4 separate times the correctly completed form  
listing phone #s to be called using my "pin #," none has been returned to me  
"approved." So I have been able to make no phone calls since May. <sup>Records</sup> will verify.

When I returned to my cell from the infirmary on 10/18, and my property (taken  
by DOC guards in Victor Bldg.) was returned about 10 days later, the only item missing  
from all my papers was my copy of the Complaint I have filed in U.S. District  
Court. My property obviously was searched meticulously and this item removed. I  
have not yet received my property (taken again on 11/12) and nothing will surprise me.

Perhaps I should have guessed the depth of the problem when I got my first "write-  
up" (hereinafter "wu") days after arrival. A FALSE report, and my complaints  
about the guard lying fellow completely deaf ears. "Grievance" and "appeal" ignored.  
More relatively little lies (compared to 11/12) (lies) followed followed by more  
"grievances" and "appeals," all ignored. So if you constantly get away with telling little  
lies, why not tell a WHOLE LIE when you feel like it? (It's going to show why not!) (or)



~~10/12/91~~ Shortly before 11/12 a reliable inmate (rare but extant) said to me: "I see the COS fucking with your mail." On 11/10 I SAW in the COS office of Victor Adg an envelope I had mailed to David Ledford, Executive Editor of The New Journal. It was empty. It had contained copies of my 3 page typed letter to the FBI and other correspondence (Not ~~flattering~~ to D.O.C.) relating observations of what I've seen, i.e. CRIS (MS) and the "Treatment programs". I think they also intercepted and threw away a pleading I had mailed to US District Court that weekend and other mail. I know soon enough. Next... if I did not know all too well what is happening I might think I was caught in an episode of "The Twilight Zone" - we came to 11/12.

On 11/12 I encountered some guards (MS) ~~and~~ bright idea of a good way to respond to what they have seen, probably even in collaboration with their buddies in Georgetown, hand in the letter to FBI: A 100% FICTITIOUS, malicious account of an "assault on staff." Give them a polygraph!! It began with "w# 1035912", which I have never read or received. Replete with loaded with lies. May I please have a copy of w# 1035912? Thank you. Then we have two more w#s - #1035912 - Twelve Sentences with 22 LIES, and #1035914, Six Sentences with 11 LIES. These guys must practice a lot to achieve such "jam packed with lies" results!! The truth is in the "statement", 1 full page, which I wrote in the hold about 45 minutes after the incident, Lt. Porter told me the next morning he had read my statement but "I gotta go on the wire - it has disappeared." Where is my statement? At the "hearing" yesterday Lt. Larry Savage had not read and did not have a copy of it, and did not know how I can get a copy. May I please have a copy of my statement? Thank you. All 11/12 w#s are OUTRAGEOUS, CRIMINAL, MALICIOUS, FICTITIOUS, FALSE "B.S."!! When Smith ("S") started reading it, full of lies and false accusations, I asked Bryan ("B") a few questions ("what is this nonsense?") He said nothing, just kept the smug look on his face - That's when I knew - he had read my letter to the FBI. And I did say, calmly and with no profanity to B: "You are quite a 'nerd'." And I did say to Bryan to S: "If you guys care a DISGUSTING law enforcement. And both are both. And these lying thugs must take you, if it is not the case, for a trail to think they are going to get away with it!!"



3 to  
Janberg

I enjoyed five years as Deputy Attorney General and five years in private practice. Over 300+ trials (of all sorts), cross-examined thousands of lying witnesses (mostly criminal-like these guards). They will Never get away with this. Never. Why don't you MAKE IT SIMPLE - give them a polygraph exam. They'll never pass a properly administered test (and they will never fool a jury - juries aren't stupid) because they are lying! I see, reading in #12, they have now involved an off. Haxman, who in fact said and did NOTHING during incident of 11/12. Just give him a lie detector on "wrestling me to the floor" and watch their entire story crumble; and start to see the truth and the nature of your problem. Mr. Janberg, you used to be A.G. for God's sake!! Get these lying thugs under control!!

It is a sad day when police law enforcement officers, your guards, refer to a Federal judge as "a powerless fuck head. That fuck head can't do shit," and "Ain't no little cocksucker in a robe gonna tell us what to do. We do what we want in here." Indeed they do. And we have B's snarled memorable remark: "FAT, huh? You don't fuck with us. We stick together."

As a direct result of those intentional, malicious, unlawful lies (all of which they knew would happen):

(1) I was wrongly removed from Greentree, triggering "the 5 year (5 YEAR) sentence which had been suspended for completion of Greentree" enrolled on 9/28, I was actively participating, attending more "classes" than required, and the "head facilitator" (C.W.B.) had given me the materials and asked me to teach a class commencing the following week! Frustration ventilation - angering (2) thrown (literally) into the "hole" for 15 days - nothing but underwear, socks and toilet paper left. I'm still in a "holding cell" in the SHU - near equivalent of "the hole." No TV, requests for forms ignored, communication severely restricted - as B's intended.

Here, there are no complaints, no grievances, no criminal conduct.

(copy sent)



ALTO  
HARRIS

misleading everybody who reads them, including the sentencing judge or any judge who might modify a sentence.

(5) I am falsely portrayed as a "super troublemaker," classified as such, wearing orange.

(6) "Good Time" Taken away and 5 year sentence in the SHU imposed (I must be in the SHU protective custody, having been proscribed 5 years)

(7) Cannot use law library, go to church, use library, find out from others what's really going on, communication extremely restricted.

The fact is that at all times, even when the situation (their conduct) was so OUTRAGEOUS that I did tell guards what they are - a liar - a disgrace - I did so with no profanity and never became "disruptive," "yelled" etc. Give me a polygraph!! I'm betting 5 years I'll pass it - and your guards will fail!

I could tell when Lt. Porter spoke to me in "the hole" that he is beginning to get the picture. Here's the picture: The metaphorical pop-pop is about to "hit the fan" and splatter all over some D.O.C. uniforms, as God knows, it should. You should be the "splatterer," not the "splatteree."

Do the right thing. Read my statement if you can find it. Closely examine B, S, and Harris separately, give them a polygraph exam. If (B) is not the case, you're not part of the problem, you'll get quite an eye opener!!

(N1) I am mindful that I'm dealing with an institution which beat a person nearly to death and then said "He fell off his bunk" when your own doctors said such injuries could not possibly be sustained in such a fall!!

(N2) All "was" are at least liberally sprinkled with (at least in my case) FALSE adjectives like "hostile, rude, belligerent, aggressive, disruptive, etc!" TOTAL BS, I just "tell it like it is" - and will!

(N3) Far too frequently, taking a serious medical problem to crisis "treated" with procrastination, prevarication, and perfectly preposterous poppycock! For example, Bill, a not atypical patient, He complained of a small tumor - a corn size & I ignored for months, it grew... until... they cut off his leg, 10 days prior Bill told me CMS told him he'd be "getting a new knee" ... knee is not knee!



PS To  
Dankers

It seems that much of Delaware Officialdom is content to keep pushing people through these (2 of which I've experienced) so-called "treatment programs," blind to reality. Or masking reality with naked proclamations of "success." It is convenient for the system. Looks good (superficially). Sounds good. Accomplishes nothing. The reason that you need hundreds of new beds is these "programs" are a huge failure - no surprise to anyone who knows what goes on. What goes on? In "Greentree" for example, inmates, with no qualifications or training (many with serious anti-social values, thinking and behaviors) @ control daily life on the tree. When we slept, when we could move, shower, etc is distortion, coercion, pure nonsense - imagine the result - you cannot. (B) teach all classes, and (C) even - oh yes! - determine which other inmates "graduate" or complete the program. The "professionals" have abrogated all responsibilities. The "counselors" are in the building maybe 3 hours per week, doing administrative paperwork, reclassifying people, moving them in and out. There is no counseling going on, can't prove this. Only with a few hundred witnesses who've passed through the "program" and a few honest DAC personnel.

Here's a copy of my letter to Judge Young shortly after a "class" on 11/12  
"Your Honor,

Just a note to let you know my progress in Greentree. My last class began with the "facilitator" (inmate teacher) saying: 'Ok, this morning we just gonna kick it 'till the cop got shot in Philly.'

A lively discussion ensued, including the merits (desirability) of killing cops, when killing cops might be 'necessary'; what ~~use~~ uses might be made of the weapon stolen from the dead officer, etc.

The class ended with the "facilitator" saying: 'Fuck the cop, let's go eat!'

Respectfully submitted

KAA

(N5) I find it hard to believe that B&S concocted this scheme on their own. You have more than a couple of rotten apples in the barrel. I'm

to Hank

a real, thorough psychiatric exam by a well known, independent "expert" any day. And a polygraph. In 60, "clean" (no cocaine pos) for a year, and just ~~the~~ getting warmed up! Ask Hank Ridgely or Myron if you should underestimate me or ignore and disregard what I'm telling you. Hank has known me well for over 30 years.

MS, NY, NS etc.

This is some of what your guards read (and the FBI letter) and OK BOY, they did not like that! Got to shut this guy up, punish him (maybe 5 years will slow him down), discredit him, intimidate him, cover out buddies' wrongdoing! Hence, the incident of 4/12/02.

God Bless our little great State of Delaware, and get the muck out of the system!

Very Sincerely  
Ken Abrach

Do the right thing instead of trying to keep someone wrongly imprisoned for five years! KRA

Your guards say when they got angry: "Nobody cares. Nobody cares about you in here, nobody gives a shit about you." That's part of what they count on in their misdeeds.

I believe somebody will care about this  
KRA

4/20/07

Learned after 4/28, when property was returned, guards had stolen all (2 pens, penicillin) writing instruments and envelopes! KRA And Months C fine thru Sept 07 of 1st notes



1/27/08

To: Col. Thomas F. MacLeish  
Superintendent - Delaware State Police  
P.O. Box 430  
Dover, DE 19903

From: Ken Abraham  
173040 SHV-19-B-114  
D.C.C. 1181 Paddock Rd  
Smymna, DE 19977

re: criminal conduct of law enforcement officials.

Dear Sir,

I contacted you as early as July, '07, and heard nothing,

I am writing to you again to ask to press charges to have some criminals arrested. They're among the worst kind of criminals; they wear law enforcement uniforms!

If you are the caliber of person and policeman of some Delaware State Troopers, I have had the privilege of working with in the past (John Bisbee, Bob Collison, Bruce Pearce, among others) you will do something,

Thank you for your attention to this matter.

enclosures - 26 pages  
copies to others.

Sincerely,

K. J. A.  
Kenneth Abraham

||||

Letter to Castle

SUMMARY of PROBLEM

"Dabney letter" of 11/25/07

"BCE letter" of 11/7

"D.O.C. "write ups" of 11/12

"Statement of 11/12

"I am not S.F.E. page.

11/14/67 It is more than a little disappointing to see law enforcement officers of my home state acting this way. Quite an understatement. I'll tell them to go back to school or to take them, Bryan & Haines come

Officers of my home state acting this way, come on?  
I had 4 pills out on table to remember to take them, Bryan & Hahn come  
in for shake down. Basked about pills and told him 3 red were corocidin and I had  
3 more boxes in drawer from Doctor. Pein pill given by Nurse and I had not taken it  
because pain comes & goes, would take when pain recurs. I said nothing about allergy  
or comm issary. Roommates Clark & Ken said maybe write up B cause pills not in orig.  
containers - so that's what I expected w/ it to be. Note (several cos had seen  
same pills (3,4) thus arrayed in prev. days and said nothing). Called to office  
7:30 and Lt starts reading "lying, disobeying order, etc and I said "what's  
this nonsense? No answer. I say "that's not right at all, what's this nonsense?"  
Bryan comes in from day room. I say "what's this?" No ans. I say: "are you sure  
you're not mistaking our conversation for another one? I am, then call?" Smith  
says "Shut the fuck up and let me finish." Bryan only snicks - says nothing.  
That's when I knew. He had seen my FBI letter copy and other stuff - cross  
programs" which I had sent to News Journal. I said to Bryan "you're quite  
a liar. No profanity, yelling, disruptive" etc. He says nothing. Then they  
both exploded when I said "you'll never get away with this." Smith says "Shut  
the fuck up." I said "this is too funny." Both use a disgrace to law enforce  
ment. Smith laughed. I say "you saw my letter to the FBI and you didn't like it!"  
Bryan snicks again. Smith "Shut the fuck up. go to your cell." I start to walk  
saying I will introduce them to Fed Ct. They'll never get away with this. Smith  
says hold it - takes my pen out of my pocket and says "c. off him" and  
call code red. Bryan not cutt me + Bryan calls "code red" - Vector Bldg.  
Smith says "you tried to stab me." gesturing. I say "what's this is outrageous!"  
You must be into to think you'll get away with this. I Disgrace to law enf + to  
Reb! This is why God made Fed. judges. Bryan's powerless Fuck Head.  
Federal Fuck Head goes to cell. I say "I don't want in here." "Storm Troopers"  
"obey gonna tell us what to do - we don't want in here." "FBI, huh. You  
- I say "good evening they say shut the fuck up." "I don't think I will shut up"  
"shut up." "I don't think I will shut up"  
"I had made arrangements with this!"



See "letter  
to Danberg"  
of 11/28/07.

# SUMMARY of PROBLEM. (C)

I am here for using cocaine, and, worse, stealing money to buy more. Been sentenced and being punished. No argument with that. However, due solely to malicious lies by D.O.C. guards I now face being — incarcerated until 2012, instead of 2008. These lies are retaliation for my efforts to contact the press and law enforcement authorities about criminal conduct of guards. OUTRAGEOUS, and compounded by the culture of cover-up. I can prove in any court of law, where the law and rules of evidence apply, everything I say, in a trial or hearing of  $\pm 2$  hours, the trier of facts will see the truth.

On 5/10/07 I was physically attacked by guards at S.U.O.P. in Georgetown without provocation or cause. It is what they do there. The brutality at S.U.O.P. is an open secret and I have many witnesses. It is widespread, systemic, inexcusable.

Guards here at D.C. in Smyrna saw that I was suing those at S.U.O.P., and (2) I was attempting to reach federal and state authorities and the press regarding the situation and other problems here. They stole legal documents and outgoing mail.

On or about 11/10/07 these guards in Victor building stole an outgoing piece of mail to The News Journal. This envelope contained a copy of my 11/7/07 letter to the FBI and correspondence describing other serious problems in this institution.

On 11/12/08 they retaliated. One glance at my "status sheet" in the D.O.C. computer system tells the reader that I have a 5 year sentence, suspended for the completion of "Greentree program." I was in the program, doing better than fine (see Danberg letter), on track to be released in late '08. But on 11/12/08 guards Bryan and Smith, probably in collusion with their buddies in Georgetown, concocted three totally FALSE



of "assault on staff." This, of course, removed me from the Greentree program, and triggered the balance of the 5 year sentence!! It also placed me here in SHU (solitary confinement) with other sanctions. As it now stands, I am to be here until the end of 2012!! (Or until I can get justice).

There is no recourse here - The "hearing officer" said that he was not interested in the truth, and Commissioner Danberg refuses to investigate, acknowledge, or solve the problems. The institution will not admit its wrongs.

Again, I have kept detailed notes since my arrival here on 1/3/07 when I refused protection and asked for treatment. I can prove what I am saying, including that guards here scorn the law, think they can break the law with impunity, and lie like crazy to cover up wrongdoing. It is a "culture of cover-up," ingrained.

While the "letter to Danberg" of 11/28/07 mentions many problems here, it is the outrageous retaliation which I deem most outrageous, and I am trying to get authorities to begin an investigation which will lead to the firing, arrest and conviction of those involved.

Please, somebody charge me with a crime for this "assault on staff"!!

**XIRA**

It would be the quickest way to a courtroom to expose the truth!!

I ask YOU, after reviewing enclosed documents, to contact:

Ms. Rona J. Combsac  
Assistant Attorney General  
Special Litigation Section - Civil Rights  
U.S. Department of Justice  
950 Pennsylvania Ave, N.W., PHB  
Washington, D.C. 20530

Crimes and violations of 1st, 4th, 5th, 8th and 14th Amendments clearly.

These guards need to be prosecuted!!! Organized pack of lying thugs. I shall answer any questions with complete candor. A Disgrace to will take polygraph exam, etc. XIRA. Delaware!!



Bldg 17 Lower D-8

## Offender Status Sheet

Date: 04/21/2008

SBI #: 00173040 Name: KENNETH R ABRAHAM Sex: M  
 Location(s): DCC Level(s): 5 Race: WHITE DOB: 04/24/1947 Sex Offender: ☐  
 AKA: KENNETH ABRAHAM  
 Offender Type: Sentenced Officer(s):

Level: 5

Start Date: 05/16/2007 MED: 05/15/2012 STRD: 11/29/2011 ADJ: 11/29/2011 PED: Statutory Days Earned: 168.00

CASE# Court/Type	CRA# Judge	Charge Desc/ Sen. Type/ Sentence Date	Status/ Eff. Date	Length Y M D			Start Dt	MED	STRD	Adj Date	CR WK
0705004852	IK07052026	THEFT \$1000 OR>	Current	5	0	0	05/16/2007	05/15/2012	11/29/2011	11/29/2011	
U8	Robert B Young	STANDARD 09/19/2007	05/16/2007								

## Special Conditions:

GRA#	Level	Code	Condition Description	Condition Comments
IK07052026	5	CRT1	Other Conditions:	SENTENCED TO 5 YEARS AT LEVEL 5 GREENTREE. UPON SUCCESSFUL COMPLETION OF LEVEL 5 GREENTREE BALANCE OF SENTENCE IS SUSPENDED FOR 18 MONTHS AT LEVEL 3. DEFENDANT SHALL REMAIN IN PROTECTIVE CUSTODY UNTIL PLACEMENT IN THE GREENTREE PROGRAM. MENTAL HEALTH EVALUATION SHALL BE PERFORMED.  STILL HAS LEVEL 4 TO FINISH ON CASE NUMBER 0605019004. JC

**AFFIDAVIT IN SUPPORT OF APPLICATION TO  
PROCEED IN FORMA PAUPERIS\***

I, Kenneth Abraham, being first duly sworn, depose and say that I am the Plaintiff Petitioner in the above-captioned case; in support of my motion to proceed without paying Court fees and costs, or give security therefore, state:

My date of birth is: 4/24/47

My current address is: SHO 19 B-v-4

D.C.C. 1181 Paddock Rd.

Shirley, DE 19977

Because of my financial situation, I am unable to pay the costs of this proceeding or give security therefore. In support of that statement, I supply the following information:

1. Nature of claim or defense is: Petition for Declaratory Judgment  
This is NOT a civil rights case. (though plaintiff are violated?)

2. Presently employed? Yes ☐ No ☒

3. If Yes, state: NA

(a) Name and address of employer:

/

(b) How often paid:

/

(c) Take home pay per pay period:

/

\* All requests for information must be supplied, if possible. Failure to supply information may result in denial of your motion to proceed *in forma pauperis*.



4. If No, state:

(a) Name and address of last employer: *Self and Dave Poole Marketing, Orlando, FL, address not available*

(b) Date of last employment: *Jan. 2006*

5. State whether you have received any income (dividends, rent, savings interest, etc.), gifts, such as stocks, bonds or cash, from any source in the last twelve months.

Yes *Yes* No *No*

6. If Yes, state: *NA*

(a) Amount of income or gift, or its value:

*One surprise deposit to my prison account of 100.00.*

(b) When received:

*Approximately December '07.*

(c) From whom or what received:

*From Frank Cardone*

(d) Whether regular or one time:

*One time*

7. List all property owned, whether held in your name alone or jointly with anyone else:

(a) Real estate: *None*

(b) Personal property (stocks, bonds, bank accounts, vehicles):

*One 2000 Model Chevy Prism with serious body damage*

(c) Name and address of and relationship to any joint owner, designating which property is jointly owned and name of joint owner:

NA

8. If you have a spouse, state:

NA

(a) Amount of any income received:

(b) Source

(c) Frequency income is received:

9. If a prisoner, attach Department of Correction certified statement of your inmate account. The summary of your inmate account shall contain all account activity for the 6-month period immediately preceding the filing of the complaint, or for the entire time you have been incarcerated, whichever time is less.

10. If a prisoner, provide the following requested information.

(a) At any time while incarcerated or detained at any facility, have you previously brought an action or an appeal in a federal court or in any court of this State? Yes

And never before, in 60 years, have I had to sue anyone on my own behalf. This place (CACC) thinks it's beyond the law.

(b) If the answer to (a) was yes, identify the court(s) and provide the civil action(s) or appeal number(s) for each case. State Court - Del. Ct of Chancery #3156-CC  
Federal Court - US Dist. Ct, No. 07-593

State Ct - Chancery, Case No 3448-VCS,  
Appeal to US AC of interim decisions in case 07-593, US AC (5th Cir)  
Case No 08-1103



(c) If the answer to (a) above was yes, state the outcome of each action or appeal.

#3156 Chancery Case resolved by defendants' compliance with relief requested. Dismissed as moot. *re medical case.*

Federal still pending → #07-93-  
#3448 Chancery Case dismissed, court saying it should be handled by Federal court as part of #07-593. Appeal # 084103, ~~pending~~ dismissed 4/4/08

11. If you are a prisoner and your complaint relates to a condition of confinement, you must have fully exhausted all administrative remedies available through the institutional grievance procedure. If you have not fully exhausted your administrative remedies, do not file the complaint in this matter or the motion to proceed in forma pauperis. *as not timely - premature*

If this condition applies to you, state whether you have exhausted all administrative remedies. *Does not apply - This is not a civil rights case, it is*

*Petition for Declaratory Judgment*

If you have fully exhausted all administrative remedies, attach copies of all decisions in the administrative process.

12. If not listed above, state:

(a) Amount of any cash held (whether or not in a bank)

*None*

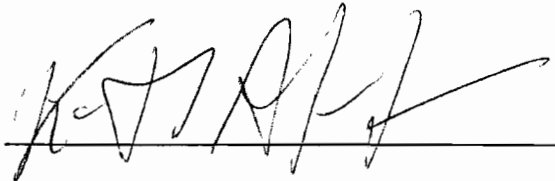
(b) Bank accounts, listing bank, account number(s) and current balance(s).

*None*

13. Itemize debts and regular monthly expenses:

*Debts - Restitution of over \$75,000 and costs and fees. Other misc. debts of \$50,000*

14. List names and addresses of any dependents:

I, , swear or affirm that the above-  
information is true and correct and is made under penalty of perjury.

DATED: 4/2/08

I understand that if the Court directs that I pay certain fees and court costs but dismisses my complaint or claim, the Court keeps power over me until all costs and fees are paid.

SWORN TO AND SUBSCRIBED before me this 2nd day of  
April, 2008.

  
Title Notary

**Brian D. Engrem**  
**Notary Public, State of Delaware**  
**My Commission Expires June 14, 2008**

Revised 7.17.03

\* All requests for information must be supplied, if possible. Failure to supply information may result in denial of your motion to proceed *in forma pauperis*.



**DELAWARE CORRECTIONAL CENTER**  
**SUPPORT SERVICES OFFICE**  
**MEMORANDUM**

TO: Kenneth Abraham SBI#: 173040

FROM: Stacy Shane, Support Services Secretary

RE: 6 Months Account Statement

DATE: April 1, 2008

Attached are copies of your inmate account statement for the months of October 1, 2007 to March 31, 2008.

The following indicates the average daily balances.

<u>MONTH</u>	<u>AVERAGE DAILY BALANCE</u>
<u>Oct</u>	<u>0</u>
<u>Nov</u>	<u>0</u>
<u>Dec</u>	<u>0</u>
<u>Jan</u>	<u>54.69</u>
<u>Feb</u>	<u>0</u>
<u>March</u>	<u>0</u>

Average daily balances/6 months: 9.11

Attachments

CC: File

Stacy Shane  
4/1/08

Canefornese  
4/1/08

# Individual Statement From October 2007 to December 2007

Date Printed: 4/1/2008

Page 1 of 1

<b>SBI</b>	<b>Last Name</b>	<b>First Name</b>	<b>MI</b>	<b>Suffix</b>	<b>Beginning Month Balance:</b>	<b>Pay To</b>	<b>Source Name</b>
00173040	ABRAHAM	KENNETH	R		\$0.00		
<b>Current Location:</b>	<b>19</b>	<b>Comments:</b>			<b>Ending Month Balance:</b>		
					\$0.00		

<b>Trans Type</b>	<b>Date</b>	<b>Deposit or Withdrawal Amount</b>	<b>Medical Hold</b>	<b>Non-Medical Hold</b>	<b>Balance</b>	<b>Trans #</b>	<b>MO# / Ck#</b>	<b>Pay To</b>	<b>Source Name</b>
Supplies-MailPosta	10/12/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	499455		9/27/07	
Supplies-MailPosta	10/12/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	499502		10/3/07	
Supplies-MailPosta	10/16/2007	\$0.00	\$0.00	(\$2.70)	\$0.00	500970		INDIGENT 10/3/07	
Supplies-MailPosta	10/19/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	502624		10/10/07	
Supplies-MailPosta	10/19/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	502663		10/7/07	
Supplies-MailPosta	10/19/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	502664		10/8/07	
Supplies-MailPosta	10/19/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	502719		10/5/07	
Supplies-MailPosta	11/13/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	512887		10/26/07	
Supplies-MailPosta	11/13/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	512888		10/26/07	
Supplies-MailPosta	11/15/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	514899		10/26/07	
Medical	11/20/2007	\$0.00	(\$8.00)	\$0.00	\$0.00	516469		11/2/07	
Supplies-MailPosta	11/26/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	518026		11/8/07	
Supplies-MailPosta	11/26/2007	\$0.00	\$0.00	(\$0.75)	\$0.00	518033		11/8/07	
Supplies-MailPosta	11/26/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	518034		11/7/07	
Supplies-MailPosta	11/29/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	520177		11/4/07	
Supplies-MailPosta	11/29/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	520179		11/4/07	
Supplies-MailPosta	11/29/2007	\$0.00	\$0.00	(\$0.58)	\$0.00	520218		11/8/07	
Supplies-MailPosta	11/29/2007	\$0.00	\$0.00	(\$0.41)	\$0.00	520269		11/12/07	
Supplies-MailPosta	12/11/2007	\$0.00	\$0.00	(\$6.44)	\$0.00	526355		INDIGENT 12/3/07	

**Ending Month Balance: \$0.00**

**Total Amount Currently on Medical Hold: (\$6.00)**

**Total Amount Currently on Legal Hold: (\$18.00)**

**Total Amount Currently on Restitution Hold: \$0.00**

**Total Amount Currently on Other Hold: (\$53.08)**



# Individual Statement From January 2008 to March 2008

Date Printed: 4/1/2008

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SBI	Last Name	First Name	MI	Suffix	Beginning Month Balance:	Ending Month Balance:
00173040	ABRAHAM	KENNETH	R		\$0.00	\$0.00
Current Location: 19					Comments:	

Trans Type	Date	Deposit or Withdrawal Amount	Medical Hold	Non-Medical Hold	Balance	Trans #	MO# / Ck#	Pay To	Source Name
Supplies-MailPosta	1/7/2008	\$0.00	\$0.00	(\$0.82)	\$0.00	538043		12/10/07	
Supplies-MailPosta	1/7/2008	\$0.00	\$0.00	(\$0.82)	\$0.00	538044		12/10/07	
Supplies-MailPosta	1/7/2008	\$0.00	\$0.00	(\$0.82)	\$0.00	538045		12/10/07	
Supplies-MailPosta	1/7/2008	\$0.00	\$0.00	(\$0.82)	\$0.00	538046		12/10/07	
Supplies-MailPosta	1/7/2008	\$0.00	\$0.00	(\$0.82)	\$0.00	538047		12/10/07	
Supplies-MailPosta	1/7/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	538244		12/22/07	
Mail	1/10/2008	\$100.00	\$0.00	\$0.00	\$100.00	541445	00039480		F CANDONE
Supplies-MailPosta	1/10/2008	\$0.00	\$0.00	(\$1.82)	\$100.00	541541		12/27/07	
Supplies-MailPosta	1/10/2008	\$0.00	\$0.00	(\$1.82)	\$100.00	541542		12/27/07	
Supplies-MailPosta	1/10/2008	\$0.00	\$0.00	(\$1.82)	\$100.00	541543		12/27/07	
Supplies-MailPosta	1/10/2008	\$0.00	\$0.00	(\$1.48)	\$100.00	541544		12/27/07	
Supplies-MailPosta	1/10/2008	\$0.00	\$0.00	(\$0.92)	\$100.00	541545		12/27/07	
Supplies-MailPosta	1/10/2008	\$0.00	\$0.00	(\$0.75)	\$100.00	541546		12/27/07	
Supplies-MailPosta	1/10/2008	\$0.00	\$0.00	(\$0.41)	\$100.00	541605		12/20/07	
Canteen	1/22/2008	(\$14.85)	\$0.00	\$0.00	\$85.15	545014			US DIST COURT
Pay-To	1/22/2008	(\$10.00)	\$0.00	\$0.00	\$75.15	545195			BAXTER ABRAHAM
Pay-To	1/22/2008	(\$10.00)	\$0.00	\$0.00	\$65.15	545197			1/3/08
Supplies-MailPosta	1/23/2008	\$0.00	\$0.00	(\$0.75)	\$65.15	545956		12/30/07	
Supplies-MailPosta	1/23/2008	\$0.00	\$0.00	(\$0.75)	\$65.15	546001		12/07	
Supplies-MailPosta	1/23/2008	\$0.00	\$0.00	(\$0.92)	\$65.15	546021		12/30/07	
Supplies-MailPosta	1/23/2008	\$0.00	\$0.00	(\$0.92)	\$65.15	546022		12/30/07	
Medical	1/23/2008	(\$4.00)	\$0.00	\$0.00	\$61.15	546040		8/9/07	
Medical	1/23/2008	(\$4.00)	\$0.00	\$0.00	\$57.15	546042		6/5/07	
Medical	1/23/2008	(\$8.00)	\$0.00	\$0.00	\$49.15	546069		11/2/07	
Supplies-MailPosta	1/29/2008	\$0.00	\$0.00	(\$0.58)	\$49.15	548157		1/4/08	
Supplies-MailPosta	1/29/2008	\$0.00	\$0.00	(\$0.58)	\$49.15	548205		1/4/08	
Supplies-MailPosta	1/29/2008	\$0.00	\$0.00	(\$1.82)	\$49.15	548216		1/4/08	
Supplies-MailPosta	1/29/2008	\$0.00	\$0.00	(\$0.58)	\$49.15	548227		1/4/08	
Pay-To	1/29/2008	(\$2.00)	\$0.00	\$0.00	\$47.15	548317			US DISTRICT COURT
Pay-To	1/29/2008	(\$2.00)	\$0.00	\$0.00	\$45.15	548343			US DISTRICT COURT
Supplies-MailPosta	1/29/2008	\$0.00	\$0.00	(\$0.82)	\$45.15	548351		1/11/08	

# Individual Statement From January 2008 to March 2008

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SBI	Last Name	First Name	MI	Suffix	Beginning Month Balance:	Ending Month Balance:
00173040	ABRAHAM	KENNETH	R		\$0.00	\$0.00
Current Location: 19					Comments:	

Trans Type	Date	Deposit or Withdrawal Amount	Medical Hold	Non-Medical Hold	Balance	Trans #	MO# / Ck#	Pay To	Source Name
Supplies-MailPosta	2/1/2008	(\$2.17)	\$0.00	\$0.00	\$42.98	550631		INDIGENT 6/4/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$42.57	550648		7/19/07	
Supplies-MailPosta	2/1/2008	(\$1.82)	\$0.00	\$0.00	\$40.75	550653		12/27/07	
Supplies-MailPosta	2/1/2008	(\$1.82)	\$0.00	\$0.00	\$38.93	550654		12/27/07	
Supplies-MailPosta	2/1/2008	(\$1.82)	\$0.00	\$0.00	\$37.11	550655		12/27/07	
Supplies-MailPosta	2/1/2008	(\$1.48)	\$0.00	\$0.00	\$35.63	550656		12/27/07	
Supplies-MailPosta	2/1/2008	(\$0.92)	\$0.00	\$0.00	\$34.71	550658		12/27/07	
Supplies-MailPosta	2/1/2008	(\$0.75)	\$0.00	\$0.00	\$33.96	550660		12/27/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$33.55	550662		8/7/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$33.14	550679		7/5/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$32.73	550696		8/5/07	
Supplies-MailPosta	2/1/2008	(\$2.74)	\$0.00	\$0.00	\$29.99	550715		INDIGENT 8/8/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$29.58	550719		12/20/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$29.17	550724		8/5/07	
Supplies-MailPosta	2/1/2008	(\$2.66)	\$0.00	\$0.00	\$26.51	550727		INDIGENT 7/2/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$26.10	550741		8/8/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$25.69	550745		6/22/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$25.28	550750		7/11/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$24.87	550754		7/27/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$24.46	550759		8/14/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$24.05	550764		8/7/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$23.64	550765		8/6/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$23.23	550766		8/12/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$22.82	550773		8/28/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$22.41	550777		8/23/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$22.00	550778		8/3/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$21.59	550779		8/30/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$21.18	550780		8/30/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$20.77	550781		8/31/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$20.36	550786		9/5/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$19.95	550791		9/27/07	



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Date Printed: 4/1/2008

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SBI	Last Name	First Name	MI	Suffix	Beginning Month Balance:	Ending Month Balance:
00173040	ABRAHAM	KENNETH	R		\$0.00	\$0.00
Current Location: 19					Comments:	

Trans Type	Date	Deposit or Withdrawal Amount	Medical Hold	Non-Medical Hold	Balance	Trans #	MO# / Ck#	Pay To	Source Name
Supplies-MailPosta	2/1/2008	(\$2.74)	\$0.00	\$0.00	\$17.21	550799		INDIGENT 9/5/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$16.80	550801		9/12/07	
Supplies-MailPosta	2/1/2008	(\$1.23)	\$0.00	\$0.00	\$15.57	550802		9/23/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$15.16	550806		9/14/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$14.75	550814		9/14/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$14.34	550815		9/14/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$13.93	550830		10/3/07	
Supplies-MailPosta	2/1/2008	(\$0.75)	\$0.00	\$0.00	\$13.18	550840		1/3/08	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$12.77	550847		10/7/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$12.36	550848		10/8/07	
Supplies-MailPosta	2/1/2008	(\$0.75)	\$0.00	\$0.00	\$11.61	550853		12/30/07	
Supplies-MailPosta	2/1/2008	(\$0.92)	\$0.00	\$0.00	\$10.69	550854		12/07	
Supplies-MailPosta	2/1/2008	(\$0.92)	\$0.00	\$0.00	\$9.77	550855		12/30/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$9.36	550858		10/5/07	
Supplies-MailPosta	2/1/2008	(\$2.70)	\$0.00	\$0.00	\$6.66	550859		INDIGENT 10/3/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$6.25	550878		10/10/07	
Supplies-MailPosta	2/1/2008	(\$0.58)	\$0.00	\$0.00	\$5.67	550900		1/4/08	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$5.26	550912		10/26/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$4.85	550913		10/26/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$4.44	550914		10/26/07	
Supplies-MailPosta	2/1/2008	(\$0.58)	\$0.00	\$0.00	\$3.86	550927		1/4/08	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$3.45	550930		11/8/07	
Supplies-MailPosta	2/1/2008	(\$0.75)	\$0.00	\$0.00	\$2.70	550931		11/8/07	
Supplies-MailPosta	2/1/2008	(\$0.41)	\$0.00	\$0.00	\$2.29	550932		11/7/07	
Supplies-MailPosta	2/1/2008	(\$1.82)	\$0.00	\$0.00	\$0.47	550936		1/4/08	
Supplies-MailPosta	2/1/2008	(\$0.47)	\$0.00	(\$0.11)	\$0.00	550940		1/4/08	
Supplies-MailPosta	2/5/2008	\$0.00	\$0.00	(\$1.99)	\$0.00	552271		1/8/08	
Supplies-MailPosta	2/5/2008	\$0.00	\$0.00	(\$0.58)	\$0.00	552273		1/8/08	
Supplies-MailPosta	2/5/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	552331		1/9/08	
Supplies-MailPosta	2/12/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	554715		1/9/08	
Supplies-MailPosta	2/12/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	554716		1/9/08	

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Date Printed: 4/1/2008

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SBI	Last Name	First Name	MI	Suffix	Beginning Month Balance:	Ending Month Balance:
00173040	ABRAHAM	KENNETH	R		\$0.00	\$0.00
Current Location: 19					Comments:	

Trans Type	Date	Deposit or Withdrawal Amount	Medical Hold	Non-Medical Hold	Balance	Trans #	MO# / Ck#	Pay To	Source Name
Supplies-MailPosta	2/12/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	554729		1/9/08	
Supplies-MailPosta	2/12/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	554735		1/14/08	
Supplies-MailPosta	2/12/2008	\$0.00	\$0.00	(\$0.75)	\$0.00	554736		1/14/08	
Supplies-MailPosta	2/12/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	554737		1/14/08	
Supplies-MailPosta	2/14/2008	\$0.00	\$0.00	(\$3.22)	\$0.00	556355		INDIGENT 2/4/08	
Medical	2/15/2008	\$0.00	(\$6.00)	\$0.00	\$0.00	557147		2/11/08	
Legal	2/15/2008	\$0.00	\$0.00	(\$18.00)	\$0.00	557726		JAN 2008	
Supplies-MailPosta	2/20/2008	\$0.00	\$0.00	(\$0.75)	\$0.00	559425		2/8/08	
Supplies-MailPosta	2/20/2008	\$0.00	\$0.00	(\$0.58)	\$0.00	559445		2/7/08	
Supplies-MailPosta	2/20/2008	\$0.00	\$0.00	(\$0.58)	\$0.00	559446		2/7/08	
Supplies-MailPosta	2/20/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	559488		1/22/07	
Supplies-MailPosta	2/21/2008	\$0.00	\$0.00	(\$1.48)	\$0.00	560113		1/22/08	
Supplies-MailPosta	2/21/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	560191		1/20/08	
Supplies-MailPosta	2/21/2008	\$0.00	\$0.00	(\$4.60)	\$0.00	560197		1/28/08	
Supplies-MailPosta	2/21/2008	\$0.00	\$0.00	(\$1.65)	\$0.00	560217		1/28/08	
Supplies-MailPosta	2/21/2008	\$0.00	\$0.00	(\$0.75)	\$0.00	560219		1/28/08	
Supplies-MailPosta	2/21/2008	\$0.00	\$0.00	(\$0.58)	\$0.00	560237		1/24/08	
Supplies-MailPosta	2/22/2008	\$0.00	\$0.00	(\$2.28)	\$0.00	560403		INDIGENT 1/8/08	
Supplies-MailPosta	2/28/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	562898		1/28/08	
Supplies-MailPosta	2/28/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	562903		1/25/08	
Supplies-MailPosta	2/28/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	562904		1/27/08	
Supplies-MailPosta	2/28/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	562945		1/29/08	
Supplies-MailPosta	3/11/2008	\$0.00	\$0.00	(\$3.22)	\$0.00	568716		INDIGENT SUPPLIES	
Supplies-MailPosta	3/13/2008	\$0.00	\$0.00	(\$0.75)	\$0.00	570068		2/13/08	
Supplies-MailPosta	3/13/2008	\$0.00	\$0.00	(\$2.16)	\$0.00	570216		2/12/08	
Supplies-MailPosta	3/13/2008	\$0.00	\$0.00	(\$1.65)	\$0.00	570219		2/12/08	
Supplies-MailPosta	3/13/2008	\$0.00	\$0.00	(\$1.48)	\$0.00	570221		2/12/08	
Supplies-MailPosta	3/19/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	572934		3/18/08	
Supplies-MailPosta	3/19/2008	\$0.00	\$0.00	(\$4.60)	\$0.00	572935		3/17/08	
Supplies-MailPosta	3/20/2008	\$0.00	\$0.00	(\$0.41)	\$0.00	573689		3/19/08	



# Individual Statement From January 2008 to March 2008

Date Printed: 4/1/2008

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SBI 00173040	Last Name ABRAHAM	First Name KENNETH	MI R	Suffix	Beginning Month Balance: Ending Month Balance:	\$0.00 \$0.00
Current Location: 19      Comments:						

Trans Type	Date	Deposit or Withdrawal Amount	Medical Hold	Non-Medical Hold	Balance	Trans #	MO# / Ck#	Pay To	Source Name
Ending Month Balance:					\$0.00				

Total Amount Currently on Medical Hold: (\$6.00)  
 Total Amount Currently on Legal Hold: (\$18.00)  
 Total Amount Currently on Restitution Hold: \$0.00  
 Total Amount Currently on Other Hold: (\$53.08)

I/M: Ken Abraham  
SBI# 173060 UNIT HU17A8

DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977



Clerk  
US District Court  
US Courthouse Lockbox 18  
844 King Street  
Wilmington, DE  
19801

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STA